

1 **GEORGE M. RANALLI, ESQ.**  
Nevada Bar No. 5748  
2 **MICHAEL G. TRIPPIEDI, ESQ.**  
Nevada Bar No. 13973  
3 **RANALLI ZANIEL FOWLER & MORAN, LLC**  
2400 W. Horizon Ridge Parkway  
4 Henderson, Nevada 89052  
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Attorney for Defendant,  
6 *OUTBACK STEAKHOUSE OF FLORIDA, LLC*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 ROBERTA REED, an individual,

10 Plaintiff,

11 vs.

12 OUTBACK STEAKHOUSE OF FLORIDA,  
13 LLC, a foreign limited  
liability company; CERCA TROVA  
14 SOUTHWEST RESTAURANT GROUP,  
LLC, a foreign limited  
15 liability company; DOES 1  
through 10; ROE CORPORATIONS 11  
16 through 20; and ABC LIMITED  
LIABILITY COMPANIES 21 through  
17 30

18 Defendants.

CASE NO.: 2:19-cv-00011

NOTICE OF CORRECTED IMAGE OF  
THE STIPULATION AND ORDER TO  
REMAND TO NEVADA STATE COURT  
AND LIMIT RECOVERABLE DAMAGES  
TO \$75,000

19 This action was originally filed in the Eighth Judicial  
20 District Court of the State of Nevada, on December 4, 2018, and  
21 thereafter removed to this Court on January 3, 2019. In  
22 consideration of a stipulation to remand to State Court,  
23 Plaintiff ROBERTA REED stipulates that, if she were to recover  
24

1 damages against OUTBACK STEAKHOUSE OF FLORIDA, LLC for all  
2 allegations in her Complaint, such damages would in no event  
3 exceed the sum of Seventy-Five Thousand Dollars (\$75,000.00).

4 Accordingly, the parties stipulate as follows:

5 1. This case arises out of a premises liability  
6 negligence claim;

7 2. Pursuant to this Stipulation, under no circumstances  
8 can Plaintiff ROBERTA REED recover more than \$75,000.00 from  
9 Defendant OUTBACK STEAKHOUSE OF FLORIDA, LLC;

10 3. In no event shall judgment be entered in favor of  
11 Plaintiff ROBERTA REED and awarding damages, whether general,  
12 special, punitive or otherwise, in an amount in excess of  
13 \$75,000.00. Such amount does not include attorney's fees, costs  
14 or interest that Plaintiff ROBERTA REED could claim as a  
15 prevailing party;

16 4. Plaintiff ROBERTA REED acknowledges and agrees that the  
17 full amount of damages, whether general, special, punitive or  
18 otherwise, incurred or sustained from any and all claims arising  
19 out of or relating to this action, regardless of claim or theory  
20 of liability and regardless of whether presently pled or not, is  
21 not greater than the total sum of \$75,000.00 and she will  
22 neither seek nor accept any award of damages in this action  
23 greater than this sum;

1           5. By entering into this stipulation, Defendant OUTBACK  
2 STEAKHOUSE OF FLORIDA, LLC neither acknowledges nor concedes any  
3 liability with respect to any claims brought by Plaintiff  
4 ROBERTA REED in her Complaint, whether original or as may be  
5 amended;

6           6. This action shall be remanded to Nevada District  
7 Court, Clark County.

8 February 19, 2019.

9 **NETTLES LAW FIRM**

10 */s/ Brian D. Nettles*

11 **BRIAN D. NETTLES, ESQ.**

12 Nevada Bar No.: 7462

13 **CHRISTIAN M. MORRIS, ESQ.**

14 1389 Galleria Drive. Ste 200

15 Henderson, Nevada 89014

16 Attorneys for Plaintiff

17 ROBERTA REED

February 19, 2019.

**RANALLI ZANIEL FOWLER & MORAN,  
LLC**

*/s/ Michael G. Trippiedi*

**GEORGE M. RANALLI, ESQ.**

Nevada Bar No.: 5748

**MICHAEL G. TRIPPIEDI, ESQ.**

Nevada Bar No. 13973

2400 W. Horizon Ridge Parkway

Henderson, Nevada 89052

Attorney for Defendant

OUTBACK STEAKHOUSE

OF FLORIDA, LLC

**ORDER**

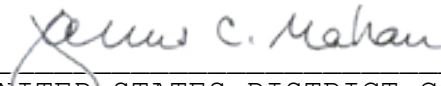
**BASED UPON THE STIPULATION OF THE PARTIES** and good cause appearing therefore,

**IT IS HEREBY ORDERED** that under no circumstances can Plaintiff ROBERTA REED recover more than \$75,000.00 from Defendant OUTBACK STEAKHOUSE OF FLORIDA, LLC;

**IT IS FURTHER ORDERED** that the \$75,000 limit on damages recoverable by Plaintiff ROBERTA REED against Defendant OUTBACK STEAKHOUSE OF FLORIDA, LLC does not include attorney's fees, costs or interest that Plaintiff ROBERTA REED could claim as a prevailing party;

**IT IS FURTHER ORDERED** that this case is remanded to Nevada District Court, Clark County.

Dated: February 21, 2019.

  
UNITED STATES DISTRICT COURT